

The Honorable James L. Robart

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

NO. CR17-235-JLR

Plaintiff

~~(PROPOSED)~~

PAUL D. LAMARCHE,

PROTECTIVE ORDER

Defendant.

This matter having come before the Court on a Stipulated Motion for Entry of a Discovery Protective Order, the Court hereby enters the following:

DISCOVERY PROTECTIVE ORDER

A. Definitions

As used in this Order, the term “Protected Information” means any date of birth, Social Security number, driver’s license number, bank account number, credit card number, personal identification number, address, telephone number, name and/or location of employment, criminal history record, background check, immigration history/status, and/or any other similar information or number implicating a privacy interest and belonging to an individual, business, partnership, or corporation.

1 “Protected Information” also includes the name of any victim of the charged
2 offenses or any non-defendant witness.

3 As used in this Order, the term “Protected Material” means any document or other
4 record containing or reflecting Protected Information.

5 **B. Procedures**

6 The government is not required to redact Protected Information that pertains only
7 to the Defendant or an immediate family member of the Defendant.

8 Defense counsel may produce to the Defendant any documents that contain
9 Protected Information or Protected Material that pertains only to the Defendant or an
10 immediate family member of the Defendant. Defense counsel may also produce any
11 document to the Defendant that does not contain any Protected Information or
12 Protected Material.

13 Items designated in the government’s discovery log as “Protected” contain
14 Protected Information and the associated files and/or documents are not to be produced to
15 the Defendant except as described below.

16 Possession of all other Protected Information and/or Protected Material is hereby
17 limited to the attorneys of record in the above captioned case and their investigators and
18 agents. The attorneys of record and their investigators and agents may review Protected
19 Information and/or Protected Material with the Defendant. The Defendant may visually
20 inspect and review such documents but shall not be allowed to possess Protected
21 Information (such as unredacted copies of Protected Material or notes, copies, or
22 photographs of such Protected Material containing Protected Information). The
23 Defendant may possess documents from which all Protected Information has been
24 redacted.

25 The attorneys of record and their investigators and agents may review or discuss
26 the contents of documents containing Protected Material with any prospective witness, as
27 long as the attorneys of record and investigators and agents do not share the unredacted
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1 documents, or share any Protected Information of victims or witnesses, with any
2 prospective witness.

3 If any Protected Information or Protected Material is filed in court or otherwise
4 disseminated as part of litigation, the parties agree to redact such information prior to
5 filing; unless, based on a party's application prior to filing, the Court finds that an
6 unredacted filing is necessary and appropriate.

7 For redactions, numbers that constitute Protected Information shall be redacted to
8 the last 2-4 digits and names shall be redacted to initials, or otherwise as needed to
9 comply with applicable federal and local rules.

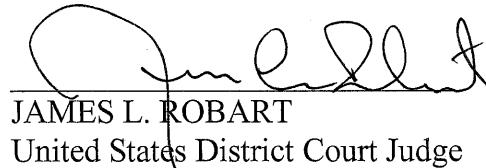
10 The attorneys of record and their investigators and agents shall keep any Protected
11 Material secured whenever the Protected Material is not being used in furtherance of their
12 work in the above-captioned case.

13 All documents containing Protected Material shall be returned to the
14 United States, or destroyed, once all charges are resolved by dismissal or by final
15 conviction.

16 The parties agree that this Protective Order may be modified, as necessary, by
17 filing with the Court a Stipulated Order Modifying the Protective Order, or by other order
18 of the Court.

19 DATED this 1st day of October, 2017.

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JAMES L. ROBART
United States District Court Judge

Presented by:

/s/ Stephen Hobbs
STEPHEN HOBBS
Assistant United States Attorney